

**SUMMARY OF THE
POLICY AND PROGRAM STRUCTURE COMMITTEE MEETING
APRIL 21, 1999**

The Policy and Program Structure Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Wednesday, April 21, 1999, at 11 a.m. Eastern Daylight Time (EDT). The meeting was led by its chair, Ms. Pauline Bouchard of the Minnesota Department of Health, Division of Environmental Health. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss topics from an agenda forwarded to all committee members.*

AGENDA ISSUES:

Glossary Terms and Definitions

The committee discussed several terms and definitions that had been identified for suggested changes by committee members and other sources. The following are the suggested edits and committee decision on each term.

- The glossary terms “blind sample” and “double blind sample” were discussed and differentiated as single blind and double blind proficiency testing methods. The double blind method incorporates an intermediate step between the source of the sample material and the laboratory to analyze that sample. The committee agreed that NELAP does not require any double blind testing, although the method only enhances the concept of blind testing. The consensus of the committee was to eliminate the term “double blind sample” from the glossary.
- “Finding” and “deficiency” terms were discussed and the committee agreed that the two were redundant terms. The term “deficiency” is direct and is intended for areas where a laboratory needs improvement or corrective actions. The term “findings” was found by the committee to be more versatile, allowing both positive and negative comments and examples to be recorded during inspections or audits. The consensus of the committee was to contact members of the On-site Assessment Committee for their input on the proposal to remove the term “deficiency” from the glossary.
- The glossary terms “legal chain of custody” and “chain of custody” were discussed and found to be redundant. The committee agreed that the purpose of chain of custody procedures was to ensure the physical security of samples, data, and records. The idea that any higher priority from the addition of the word “legal” to “chain of custody” seemed extraneous, but also diluted the serious nature of the root term. The committee agreed that the term “legal chain of custody” should be dropped from the glossary, but that the checklist created by the Quality Systems Committee contains references to “legal chain of custody” procedures. Mr. Tom McAninch will contact members of the Quality Systems Committee to get their input on dropping the term before that action is taken.

- The committee agreed that the term and definition “Good Laboratory Practices (GLP)” will be dropped from the glossary.
- The committee agreed to change the wording used in defining of the term “Internal Standard.” The word “analysis” will replace the phrase “entire measurement process.”.
- The committee agreed that there was no need for the term “sample” to be included in the glossary for the sake of simplicity and avoiding future controversy over the definition.
- The terms “calibrate” and “calibration” were discussed and edits were suggested that would combine the two into one definition of the term “calibration.” The definition of the term “calibration” will be changed to read as follows: “Determination by measurement or comparison with a standard, the correct value of each scale reading on a meter, instrument or other device. The levels of the applied calibration standard should bracket the range of planned or expected sample measurements.” The committee agreed that one term and definition for calibration would simplify this matter.
- The term “laboratory” and the existing definition was discussed and the committee agreed to redefine that term as follows “Laboratory — an organized and defined facility wherein tests and calibrations are performed on environmental samples in a controlled and scientific manner.”

Ms. Bouchard will draft additional wording in Chapter 1 to reference the NELAC glossary as an appendix to Chapter 1. This wording will be forwarded to the other committee members as soon as possible for their input and the final draft version will be submitted by April 29, 1999.

Good Laboratory Practices (GLP)

The committee discussed solutions to the controversy over the references to exclusions of some GLP laboratories from NELAP requirements. The committee agreed on a need for comprehensive wording including references from 40 CFR, to clarify the exclusions to NELAC requirements for specific work done by some laboratories which may follow GLP guidelines. Ms. Bouchard will redraft pertinent wording in Chapter 1, page 3 of 18 of the NELAC Standards and forward this wording to the committee members as soon as possible. Footnote 1 will be removed as such and reworded to be included in section 1.4.2.

Constitution and Bylaws Language Changes

Changes to the NELAC Constitution made during the Fourth NELAC Interim Meeting will also be incorporated into the language of relevant paragraphs of Chapter 1 of the NELAC Standards. These changes will be drafted by Ms. Bouchard and the proposed new language will be forwarded to committee members as soon as possible.

The issue of when a NELAC standard takes effect after that standard has been adopted was discussed. It was suggested that in addition to the proposed items of a standard to be adopted, an effective date should also be stated as one of those items for approval. The effective date will

set a point at which the standard will apply to accrediting authorities. The current ambiguity of when a standard goes into effect after it has been adopted is unacceptable and this proposal would offer flexibility to each committee to set effective dates suitable for each standard while standardizing the process. Ms. Bouchard will see that this proposal comes before the Board of Directors for their comments and suggestions.

Comments from the Department of Defense (DoD)

- The first request from the DoD was for the committee to develop a structured reviewing and comment process for the NELAC standards that provides adequate time (90 days) for response to the committee. The current time period for review and comments is 45 days. The committee agreed the current 45 day time period seemed adequate and will remain as such until the Board of Directors has reason to recommend any change in this policy.
- Publication of NELAC Standards in the Federal Register was suggested by DoD. The committee felt that there are two problems with this proposal. 1) The expense of publication would be too great, and 2) The implication of NELAP being a federal program rather than a program in which federal agencies merely participate would not be acceptable. The publication of the NELAC Standards on the Internet seemed sufficient until such time that another alternative was proposed and discussed.
- The suggestion of standardizing the qualification requirements of Accrediting Authority Review Board (AARB) personnel and including these requirements in Chapter 1 of the NELAC Standards was also discussed, but no resolution was reached. The committee agreed to defer this issue until the Sixth Annual NELAC Meeting.

Naming Potential New Committee Members

Ms. Marlene Moore will rotate off the committee soon and she has named Mr. Jack Sherrill to replace her as a contributing member.

Ms. Bouchard and Mr. Tito Madrid are both government representatives who are rotating off the committee. Ms. Bouchard suggested three possible replacements.

ADJOURNMENT

Ms. Bouchard closed by thanking everyone for their hard work during her time with the committee and with that the meeting was adjourned.

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**ACTION ITEMS
PROGRAM POLICY AND STRUCTURE COMMITTEE MEETING
APRIL 21, 1999**

Item No.	Action	Date to be Completed
1.	Ms. Bouchard will develop language to reference the NELAC glossary as an appendix to Chapter 1.	April 29, 1999
2.	Ms. Bouchard will redraft language for the GLP exemption from NELAP accreditation issue from section 1.4.2	April 29, 1999

PARTICIPANTS
PROGRAM POLICY AND STRUCTURE COMMITTEE MEETING
APRIL 21, 1999

Name	Affiliation	Address
Bouchard, Pauline Co-Chair	Div of Env Health, MN Dept of Health	T: (612) 215 - 0710 F: (612) 215 - 0979 E: pauline.bouchard@health.state.mn.us
Davies, Marcia Co-Chair,	US Army Corps of Engineers	T: (402) 697 - 2555 F: (402) 697 - 2595 E: marcia.c.davies@usace.army.mil
Burton, Arthur	Sequoia Analytical Laboratory	T: (650) 364 - 9600 F: (650) 364 - 2048 E: burton@sequoialabs.com
Clark, Stephen (Absent)	USEPA/OW	T: (202) 260 - 7159 F: (202) 260 - 4383 E: clark.stephen@epamail.epa.gov
Kimsey, Paul	CA State, Department of Health Services	T: (510) 540 - 2408 F: (510) 540 - 3075 E: pkimsey@hwi.cahwnet.gov
Luna, Roberto (Absent)	City of Longmont Water/Waste Water	T: (303) 651 - 8666 F: (303) 682 - 9543 E: colwwtp@lanminds.net
McAninch, Thomas	Eastman Chemical Co.	T: (903) 237 - 5473 F: (903) 237 - 6395 E: twmcan@eastman.com
Moore, Marlene (Absent)	Advanced Systems Inc.	T: (302) 834 - 9796 F: (302) 995 - 1086 E: mmoore@advancedsys.com
Rosecrance, Ann	Core Laboratories	T: (713) 329 - 7414 F: (713) 895 - 8982 E: arosecrance@corelabcorp.com
Ennis, J. Todd (Contractor Support)	Research Triangle Institute	T: (919) 541-7226 F: (919) 541-7386 E: jte@rti.org